



# Legal Aid Society

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Shelley K. Krininger  
Ferne McCauley  
Susan L. Metcalf  
L. Marie Tull  
Alberta H. White

January 22, 2004

Mr. Thomas M. Dorman, Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
Frankfort, Kentucky 40602-0615

RECEIVED  
JAN 23 2004  
PUBLIC SERVICE  
COMMISSION

**RE: In The Matter Of:  
AN ADJUSTMENT OF THE GAS AND ELECTRIC RATES TERMS  
AND CONDITIONS OF LOUISVILLE GAS AND ELECTRIC  
COMPANY, CASE NO. 2003-00433**

Dear Mr. Dorman:

Enclosed for filing in the above-captioned case are the original and ten (10) copies of the Motion for Full Intervention of Metro Human Needs Alliance Inc. and the original and ten (10) copies of the Motion for Full Intervention of People Organized and Working for Energy Reform.

Please confirm your receipt of this filing by placing the stamp of your office with the date received on the enclosed additional copy of each of these Motions and return them to me in the self-addressed stamped envelope.

Thank you for your assistance. Please contact me if you have any questions or need further information regarding this matter.

Very truly yours,

Lisa Kilkelly

LK  
Enclosures

cc: Parties of Record



COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED  
JAN 23 2004  
PUBLIC SERVICE  
COMMISSION

**In The Matter Of:**

AN ADJUSTMENT OF THE GAS AND ELECTRIC )  
RATES, TERMS AND CONDITIONS OF ) CASE NO.  
LOUISVILLE GAS AND ELECTRIC COMPANY ) 2003-00433

**MOTION FOR FULL INTERVENTION**  
**BY METRO HUMAN NEEDS ALLIANCE**

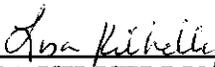
Comes now, **METRO HUMAN NEEDS ALLIANCE** ("MHNA"), by counsel,  
and files this Motion for Full Intervention in the above-styled proceeding.

MHNA, a non-profit corporation, is a coalition of social services agencies which assists low income households whose utility service is disconnected or who are threatened with disconnection by the Louisville Gas and Electric Company ("LG&E") because of their inability to pay utility bills. Member agencies provide both financial assistance and advocacy to their clients. MHNA's address is P.O. Box 2377, Louisville, Kentucky 40201.

MHNA has a keen interest in this proceeding, since LG&E's rates, terms and conditions greatly affect the low-income households who are MHNA's clients. The Commission has previously granted MHNA status as a full intervenor in rate cases to lower utility bills and to advocate for programs to assist low-income households in the LG&E service area. MHNA represents an interest that is not otherwise adequately represented, and full intervention by it is likely to present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.

WHEREFORE, Metro Human Needs Alliance requests that it be granted full intervention as a party to this proceeding.

Respectfully submitted,

  
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**LISA KILKELLY**  
LEGAL AID SOCIETY, INC.  
425 West Muhammad Ali Blvd.  
Louisville, Kentucky 40202  
(502) 585-6980  
Attorney for METRO HUMAN  
NEEDS ALLIANCE

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing motion for full intervention by Metro Human Needs Alliance was served on the following persons on the 22nd day of January, 2004, United States mail, postage prepaid.

Kendrick R. Riggs  
Allyson K. Sturgeon  
Ogden Newell & Welch PLLC  
1700 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202

Robert M. Watt, III  
Stoll, Keenon & Park, LLP  
300 West Vine Street, Suite 2100  
Lexington, Kentucky 40507-1801

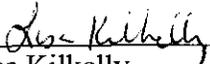
Linda S. Portasik  
Senior Corporate Attorney  
LG&E Energy Corp.  
220 West Main Street  
Louisville, Kentucky 40202

Elizabeth E. Blackford  
Assistant Attorney General  
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Office of the Attorney General  
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General Attorney  
U.S. Army Legal Services Agency  
DAJA-RL 4118  
901 N. Stuart Street, Room 713  
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David C. Brown  
Stites & Harbison, PLLC  
400 W. Market Street, Suite 1800  
Louisville, Kentucky 40202

  
\_\_\_\_\_  
Lisa Kilkelly  
Legal Aid Society, Inc.  
425 W. Muhammad Ali Blvd.  
Louisville, Kentucky 40202  
Attorney for Metro Human Needs  
Alliance

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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

AN ADJUSTMENT OF THE GAS AND ELECTRIC )  
RATES, TERMS AND CONDITIONS OF ) CASE NO.  
LOUISVILLE GAS AND ELECTRIC COMPANY ) 2003-00433

MOTION FOR FULL INTERVENTION  
BY PEOPLE ORGANIZED AND WORKING  
FOR ENERGY REFORM

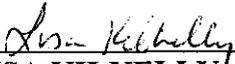
Comes now, **PEOPLE ORGANIZED AND WORKING FOR ENERGY REFORM ("POWER")**, by counsel, and files this Motion for Full Intervention in the above-styled proceeding.

POWER, an unincorporated Kentucky nonprofit organization, was formed in the late 1980s to work for preservation of utility services for low-income households. Its members are low-income residential patrons of LG&E. POWER's address is P.O. Box 39143, Louisville, Kentucky 40233-9143.

POWER has a keen interest in this proceeding since LG&E's rates, terms and conditions impact its members' abilities to afford utility service. POWER has previously been granted status by this Commission as a full intervenor in rate cases to lower utility bills and to advocate for programs to assist low-income households in the LG&E service area. Petitioner represents an interest which is not otherwise adequately represented, and full intervention by it is likely to present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.

WHEREFORE, People Organized and Working for Energy Reform requests that it be granted full intervention as a party to this proceeding.

Respectfully submitted,

  
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**LISA KILKELLY**  
LEGAL AID SOCIETY, INC.  
425 West Muhammad Ali Blvd.  
Louisville, Kentucky 40202  
(502) 585-6980  
Attorney for PEOPLE ORGANIZED  
AND WORKING FOR ENERGY  
REFORM

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing motion for full intervention by People Organized and Working for Energy Reform was served on the following persons on the 22<sup>nd</sup> day of January, 2004, United States mail, postage prepaid.

Kendrick R. Riggs  
Allyson K. Sturgeon  
Ogden Newell & Welch PLLC  
1700 PNC Plaza  
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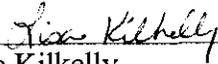
Linda S. Portasik  
Senior Corporate Attorney  
LG&E Energy Corp.  
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Assistant Attorney General  
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Attorney for People Organized and  
Working for Energy Reform